

Robert A. Gutkin, Esq. (Pro hac vice)  
 Blair M. Jacobs, Esq. (Pro hac vice)  
 Christina A. Ondrick (Pro hac vice)  
 SUTHERLAND ASBILL & BRENNAN LLP  
 1275 Pennsylvania Avenue, N.W.  
 Washington, DC 20004-2415  
 Tel: 202-383-0100  
 Fax: 202-637-3593

**UNITED STATES DISTRICT COURT  
 SOUTHERN DISTRICT OF NEW YORK**

<b>LEIGHTON TECHNOLOGIES LLC,</b>	)
	)
<b>Plaintiff,</b>	) <b>Case No. 04-cv-02496 (CM)(LMS)</b>
	)
<b>v.</b>	)
	) <b>PLAINTIFF AND COUNTERCLAIM</b>
	) <b>DEFENDANT LEIGHTON</b>
<b>OBERTHUR CARD SYSTEMS, S.A.,</b>	) <b>TECHNOLOGIES LLC'S MOTION</b>
<b>OBERTHUR CARD SYSTEMS,</b>	) <b>TO FILE REPLY BRIEF UNDER SEAL</b>
<b>OF AMERICA CORPORATION</b>	)
	)
<b>Defendants.</b>	)
	)
<b>OBERTHUR CARD SYSTEMS, S.A.,</b>	)
<b>OBERTHUR CARD SYSTEMS</b>	)
<b>OF AMERICA CORPORATION</b>	)
	)
<b>Counterclaim Plaintiffs,</b>	)
	)
<b>v.</b>	)
	)
<b>LEIGHTON TECHNOLOGIES LLC,</b>	)
<b>GENERAL PATENT CORPORATION</b>	)
<b>INTERNATIONAL,</b>	)
<b>GENERAL PATENT CORPORATION,</b>	)
<b>AND IP HOLDINGS LLC,</b>	)
	)
<b>Counterclaim Defendants.</b>	)
	)

On April 28, 2008, Leighton Technologies LLC (“Leighton”) intends to file a Reply Brief In Further Support of Its Motion for Leave to File an Amended Answer to Counterclaims, Affirmative Defenses (“Reply Brief”). Pursuant to paragraph 14 of the Protective Order entered in this case on August 20, 2004, Leighton respectfully requests that the Court permit Leighton’s Reply Brief to be filed under seal. In support of this motion, Leighton states as follows:

1. On August 20, 2004 a Protective Order was entered in this case. A copy of the Protective Order is attached to this Motion as Ex. A.

2. The Protective Order provides in Paragraph 14, in part, that information designated “Confidential” and/or “Trial Counsel’s Eyes Only” “shall NOT be filed with the Clerk of Court,” but shall be submitted “to chambers in camera in a sealed envelope....”

3. Portions of Leighton’s Reply Brief will contain material that has been designated “CONFIDENTIAL – ATTORNEY’S EYES ONLY” pursuant to the August 20, 2004 Protective Order.

4. Pursuant to the Protective Order, Leighton will file with the Clerk of the Court an unredacted copy of its Reply Brief, in an envelope marked “SEALED AND IMPOUNDED RECORD” in the event that the instant motion is granted by the Court.

5. A Proposed Order is attached hereto.

For the reasons stated above, Leighton respectfully requests that the Court permit Leighton’s Reply Brief to be filed under seal.

Dated: April 24, 2008

SUTHERLAND ASBILL & BRENNAN LLP

/s/ Robert A. Gutkin

By: Robert A. Gutkin, Esq. (Pro hac vice)  
Blair M. Jacobs, Esq. (Pro hac vice)  
Christina A. Ondrick, Esq. (Pro hac vice)  
1275 Pennsylvania Avenue, N.W.  
Washington, D.C. 20004-2415  
Tel: 202-383-0100  
Fax: 202-637-3593

*Attorneys for Plaintiff*  
LEIGHTON TECHNOLOGIES LLC

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

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**LEIGHTON TECHNOLOGIES LLC,** )  
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)  
**Plaintiff,** ) **Case No. 04-cv-02496**  
 ) **(CM)(LMS)**  
)  
)  
**v.** ) **[PROPOSED] ORDER**  
)  
**OBERTHUR CARD SYSTEMS, S.A.,** )  
)  
)  
**Defendant.** )  
)  
)  
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Upon consideration of Plaintiff and Counterclaim Defendant Leighton Technologies LLC's Motion to File Reply Brief Under Seal, and good cause being shown, IT IS HEREBY ORDERED THAT:

Plaintiff's Motion for Leave to File Reply Brief Under Seal is GRANTED;

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Southern District of New York

**CERTIFICATE OF SERVICE**

I hereby certify that on this 24th day of April, 2008, the foregoing **PLAINTIFF**  
**LEIGHTON TECHNOLOGIES LLC'S MOTION TO FILE REPLY BRIEF UNDER**  
**SEAL** was served on all parties via e-mail and overnight mail:

By: /s/ Robert A. Gutkin \_\_\_\_\_  
Attorney for Plaintiff